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United States of America

FILED

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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL HUGHES,

Defendant.

CASE NO. 2:24-cr-0244 TLN

18 U.S.C. § 2251(a) – Sexual Exploitation of a Child
(3 counts); 18 U.S.C. § 2253(a) – Criminal Forfeiture

I N F O R M A T I O N

COUNT ONE: [18 U.S.C. § 2251(a) – Sexual Exploitation of a Child]

The United States Attorney charges: T H A T

PAUL HUGHES,

defendant herein, on or about September 27, 2018, in the County of Placer, State and Eastern District of California, did knowingly employ, use, persuade, induce, entice, and coerce minors, “Child Victim 1” and “Child Victim 2,” to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing one or more visual depictions of such conduct, to wit: a video recording, and such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

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1 COUNT TWO: [18 U.S.C. § 2251(a) – Sexual Exploitation of a Child]

2 The United States Attorney charges: T H A T

3 PAUL HUGHES,

4 defendant herein, on or about April 25, 2019, in the County of Placer, State and Eastern District of
5 California, did knowingly employ, use, persuade, induce, entice, and coerce minors, “Child Victim 1”
6 and “Child Victim 2,” to engage in sexually explicit conduct as defined in Title 18, United States Code,
7 Section 2256(2), for the purpose of producing one or more visual depictions of such conduct, to wit: a
8 video recording, and such visual depiction was produced and transmitted using materials that had been
9 mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,
10 including by computer, all in violation of Title 18, United States Code, Section 2251(a).

11 COUNT THREE: [18 U.S.C. § 2251(a) – Sexual Exploitation of a Child]

12 The United States Attorney charges: T H A T

13 PAUL HUGHES,

14 defendant herein, on or about June 15, 2019, in the County of Placer, State and Eastern District of
15 California, did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Child Victim 1,”
16 to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for
17 the purpose of producing one or more visual depictions of such conduct, to wit: a video recording and
18 images, and such visual depictions were produced and transmitted using materials that had been mailed,
19 shipped, and transported in and affecting interstate and foreign commerce by any means, including by
20 computer, all in violation of Title 18, United States Code, Section 2251(a).

21 FORFEITURE ALLEGATION: [18 U.S.C. § 2253(a) – Criminal Forfeiture]

22 1. Upon conviction of one or more of the offenses alleged in Counts One through Three of
23 this Information, defendant PAUL HUGHES shall forfeit to the United States pursuant to 18 U.S.C. §
24 2253(a), any and all matter which contains visual depictions produced, transported, mailed, shipped or
25 received in violation thereof; any property, real or personal, constituting or traceable to gross profits or
26 other proceeds the defendant obtained as a result of said violations; and any property, real or personal,
27 used or intended to be used to commit and to promote the commission of such violations, or any
28 property traceable to such property, including but not limited to:

a. Seagate External HDD, Serial Number NAC83BAR.

2. If any property subject to forfeiture as a result of the offenses alleged in Counts One through Three of this Information, for which defendant is convicted:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United State Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant, up to the value of the property subject to forfeiture.

Dated: 8/19/2024

PHILLIP A. TALBERT
United States Attorney


Denise N. Yasinow
Assistant United States Attorney

United States v. Hughes
Penalties for Information

COUNTS 1-3:

VIOLATION: 18 U.S.C. § 2251(a) – Sexual Exploitation of a Child

PENALTIES: Mandatory minimum of 15 years in prison and a maximum of up to 30 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory); \$5,000 JVT A (mandatory if the defendant is not found to be indigent); up to \$50,000 discretionary special assessment under 18 U.S.C. § 2259A

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 2253(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document